

REMARKS

Claims 1, 2, 6, 9, 11, 12, 14, 24, and 26 have been amended herein. Claims 27-40 have been added. Claims 1-40 are now pending in the Application.

Claims 1, 9, 11, 12 and 14 have been amended to more clearly recite the subject matter of the claim. No additional limitations have been added to the claims by such amendments.

Claim 2 has been amended to correct a typographical error.

Claim 6 has been amended to correspond to amended claim 1.

Claims 24 and 26 have been rewritten into independent form.

No new matter has been added. Support for the amendments is found in the Specification and original claims. Entry of the amendment is respectfully requested. Reconsideration is respectfully requested.

Rejections Pursuant To 35 U.S.C. § 112

In the Action, claim 26 was rejected pursuant to 35 U.S.C. § 112, second paragraph. It was asserted in the Action that claim 26 was indefinite in that it fails to point out what is included or exclude by the claim language. The Action also asserted that claim 26 is an omnibus type claim. This rejection is respectfully traversed.

Even though the claim as originally presented is believed to satisfy the statutory mandate, claim 26 has been amended herein to be in independent form and to recite computer readable media bearing instructions. The instructions are operative to cause at least one computer in an automated banking machine to cause the automated banking machine to carry out a method. The method generally includes the following steps.

a) receiving a first document through operation of a computer in the automated banking machine;
b) determining with the computer a first type associated with a first input device that is associated with a first display device on the machine; and c) presenting a first user interface through the first display device on the machine, responsive to the determined first type associated with the first input device and the first document.

The amendment presented herein is a clarification and does not narrow the scope of the claim. It is respectfully submitted that all the pending claims are sufficiently definite and that the rejection pursuant to 35 U.S.C. § 112 should be withdrawn.

The Pending Claims Are Not Anticipated or Obvious in View of the Applied Art

Claims 1, 4, 8, 9, 10, and 18-23 were rejected under 35 U.S.C. § 102(e) as being anticipated by Clark, et al., U.S. Patent No. 6,378,770 (“Clark”).

Claims 2 and 3 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Clark in view of Butler, et al., U.S. Patent No. 6,018,340 (“Butler”).

Claims 5-7, 11-17, 24, and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Clark in view of Coutts, et al., U.S. Patent No. 6,311,165 (“Coutts”).

These rejections are respectfully traversed.

Brief Description of the Invention

The present invention is directed to an automated banking machine such as an ATM. In an exemplary embodiment, the ATM comprises at least two user stations in operative connection with a computer. Each of the user station includes at least one display device and at least one

input device. In an exemplary embodiment, the first user station may be located on a front side of the ATM and may be operative to present to a consumer, a user interface for performing banking transactions. The first user station may also be operative to present to an authorized user, a user interface for performing servicing operations on the ATM. In the exemplary embodiment, the second user station may be located on a rear side of the ATM. The second user interface may also be operative to present to an authorized user, a user interface for performing servicing operations on the ATM.

In an exemplary embodiment, a software application operating in the ATM may be responsive to a common markup language document to generate corresponding user interface elements for user interfaces being output through the display devices of the first and second user stations. Because, the input devices at the first and second user stations may correspond to different types of input devices, the software causes the ATM to determine the type of input device associate with each user station. Responsive to this determination and the common markup language document, the software application may output user interfaces through the display devices which include user interface elements that are specifically adapted to be selected by the types of input devices associated with the respective user stations.

**The Applied References Do Not Disclose or Suggest
the Features and Relationships Recited in Applicants' Claims**

Anticipation pursuant to 35 U.S.C. § 102 requires that a single prior art reference contain all the elements of the claimed invention arranged in the manner recited in the claim. *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548, 220 USPQ 193, 198 (Fed. Cir. 1983).

Anticipation under 35 U.S.C. § 102 requires in a single prior art disclosure, each and every element of the claimed invention arranged in a manner such that the reference would literally infringe the claims at issue if made later in time. *Lewmar Marine, Inc. v. Barient, Inc.*, 822 F.2d 744, 747, 3 USPQ2d 1766, 1768 (Fed. Cir. 1987).

Before a claim may be rejected on the basis of obviousness pursuant to 35 U.S.C. § 103, the Patent Office bears the burden of establishing that all the recited features of the claim are known in the prior art. This is known as *prima facie* obviousness. To establish *prima facie* obviousness, it must be shown that all the elements and relationships recited in the claim are known in the prior art. If the Office does not produce a *prima facie* case, then the Applicants are under no obligation to submit evidence of nonobviousness. MPEP § 2142.

The teaching, suggestion, or motivation to combine the features in prior art references must be clearly and particularly identified in such prior art to support a rejection on the basis of obviousness. It is not sufficient to offer a broad range of sources and make conclusory statements. *In re Dembiczak*, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999).

Even if all of the features recited in the claim are known in the prior art, it is still not proper to reject a claim on the basis of obviousness unless there is a specific teaching, suggestion, or motivation in the prior art to produce the claimed combination. *Panduit Corp. v. Denison Mfg. Co.*, 810 F.2d 1561, 1568, 1 USPQ2d 1593 (Fed. Cir. 1987). *In re Newell*, 891 F.2d 899, 901, 902, 13 USPQ2d 1248, 1250 (Fed. Cir. 1989).

The evidence of record must teach or suggest the recited features. An assertion of basic knowledge and common sense not based on any evidence in the record lacks substantial evidence support. *In re Zurko*, 258 F.3d 1379, 59 USPQ2d 1693 (Fed. Cir. 2001).

It is respectfully submitted that the Action does not meet these burdens.

The Clark Reference

Clark is directed to a system for replenishing an automated teller machine (ATM) with currency. Clark shows an ATM (10) that includes a user panel (12) at a front of the machine (Figure 1). The user panel includes a keypad (16) and a display screen (20). A user performs transactions through use of the user panel (12) at the front of the machine. Clark also indicates that the ATM may include an operator panel (26) mounted inside the ATM (Figure 2). The operator panel includes a key pad (27) and a display screen (28). An operator attends to the maintenance of the ATM through the use of the operator panel (26).

The Butler Reference

Butler is directed to a computer system that is operative to span a desktop of a graphical user interface across multiple adjacent displays (Figure 4). Butler indicates that this feature enables a user to view large display regions (e.g. an editing window and an output window) at substantially the same time (Column 1, lines 45-58).

The Coutts Reference

Coutts is directed to a system in which an ATM (11) (Figure 1) comprised a plurality of peripheral devices such as a user interface (12), a card reader (13), a receipt printer(14), and a cash dispenser(15). The software for the peripheral devices is held in a central server (16) located externally of the ATM and linked to the terminal through a communication link (17).

**The Features Recited in Applicants' Claims
Patentably Distinguish Over Clark**

In the Action claims 1, 4, 8, 9, 10, and 18-23 were rejected under 35 U.S.C. § 102(e) as being anticipated by Clark. These rejections are respectfully traversed. Applicants response to these rejections is based on the Office's referenced interpretation of Clark. Thus, any change in the Office's interpretation of Clark shall constitute a new ground of rejection.

Applicants traverse these rejections on the grounds that the Clark reference does not contain all the elements of the claimed invention arranged in the manner recited in the claims. The features and relationships recited in Applicants' claims patentably distinguish over the Clark reference.

Claim 1

Amended claim 1 is an independent claim which is specifically directed to an automated banking machine apparatus. Claim 1 recites an automated banking machine which comprises a first input device of a first type associated with a first display device and a second input device of a second type associated with a second display device. The first input device of the first type and the second input device of the second type correspond to different types of input devices.

As discussed previously, Clark shows an ATM with both a user panel (12) and an operator panel (26). However, Clark teaches an ATM with the same type of input device (a key pad) (16, 27) at both the user panel (12) and the operator panel (26) of the ATM. Clark does not disclose or suggest an automated banking machine with first and second displays which are each associated with different types-of-input devices.

In addition claim 1 recites that the automated banking machine also comprises at least one software application. The at least one software application is operative to determine the first and the second types of the first and the second input devices. Although Clark discloses a controller 30, Clark does not disclose or suggest software or any other element of an ATM which determines the types of different input devices in the ATM.

Further claim 1 recites that the at least one software application is operative to cause a first user interface to be output through the first display device responsive to the determined first type of the first input device. Claim 1 also recites that the software application is operative to cause a second user interface of a different type to be output through the second display device responsive to the determined second type of the second input device.

An exemplary embodiment of Applicants' invention enables an automated banking machine to determine the type of input device associated with a display, and to generate an appropriate user interface at the display responsive to the type of input device associated with the display.

The Action asserts that Clark shows a display (20) that displays instructions to a user for entering a PIN after reading data stored on a card. Although Clark at best may arguably appear to show an ATM capable of generating a user interface responsive to user interaction with the ATM, nowhere does Clark disclose or suggest generating first and second user interfaces through first and second displays of an automated banking responsive to the determined types of the input device associated with each display.

Clark does not disclose each and every element of the claimed invention arranged in the manner recited in the claim, as is required to sustain the rejection. Hence, Applicants' claim 1

patentably distinguishes over the Clark reference. Therefore, it is respectfully submitted that the 35 U.S.C. § 102(e) rejection has been overcome. It follows that claims 2-7 which depend from claim 1 are likewise allowable.

Claim 8

Claim 8 is an independent claim directed to an automated banking machine apparatus. The apparatus comprises a computer and at least two user stations in operative connection with the computer. Claim 8 also recites that the apparatus comprises at least one software application which is operative to determine at least one capability of at least one input device included in each user station. Although the ATM of Clark includes a user panel and an operator panel, Clark does not disclose or suggest software or any other element of its ATM which is operative to determine a capability of the input devices included in at least two user stations.

Claim 8 also recites that the at least one software application is operative to cause a user interface to be output through the display device included in each user station. The user interface for a user station is output responsive to the at least one capability associated with the at least one input device included in the user station. The Action asserts that Clark generates screen information on the user panel and the operator panel. However nowhere in Clark is it disclosed or suggested that a user interface for a user station is output responsive to at least one capability associated with an input device included in the user station.

Clark does not disclose each and every element of the claimed invention arranged in the manner recited in the claim, as is required to sustain the rejection. Hence, Applicants' claim 8 patentably distinguishes over the Clark reference. Therefore, it is respectfully submitted that the

35 U.S.C. § 102(e) rejection has been overcome. It follows that claims 9-17 which depend from claim 8 are likewise allowable.

Claim 18

Claim 18 is an independent claim directed to a method. The method comprises:
a) providing at least one first document to an automated banking machine; and b) determining at least one first type associated with a first input device on the machine. The first input device is associated with at least one first display device on the machine. In addition claim 18 recites: c) presenting at least one first user interface through the first display device, responsive to the determined at least one first type and the at least one first document.

Clark does not disclose or suggest each of these steps. For example, as discussed previously, Clark does not disclose or suggest an automated banking machine that determines a type associated with an input device of the machine. Further Clark does not disclose or suggest presenting a user interface through a display associated with the input device, responsive to the determined type of the input device.

In addition claim 18 recites providing at least one first document to an automated banking machine. In the presenting step, the at least one first user interface is also presented through the first display device responsive to the at least one first document such as a markup language document. Clark does not disclose or suggest providing a first document. Further, Clark does not disclose or suggest presenting a user interface through a display device responsive to both a determined type of an input device and at least one first document.

Clark does not disclose each and every element of the claimed invention arranged in the manner recited in the claim, as is required to sustain the rejection. Hence, Applicants' claim 18 patentably distinguishes over the Clark reference. Therefore, it is respectfully submitted that the 35 U.S.C. § 102(e) rejection has been overcome. It follows that claims 19-23 which depend from claim 18 are likewise allowable.

The Dependent Claims

Each of the dependent claims depends directly or indirectly from an independent claim. The independent claims have been previously shown to be allowable. Thus, the dependent claims are allowable on at least the same basis. Furthermore, each of the dependent claims additionally recites specific features, relationships, and/or steps that patentably distinguish the claimed invention over the applied art. Clark does not disclose or suggest the features, relationships, and/or steps that are specifically recited in the dependent claims. Thus, it is respectfully submitted that the dependent claims are further allowable due to the recitation of such additional features, relationships, and/or steps.

Claim 4

Claim 4 depends from claim 1 and further recites at least one first document in operative connection with the at least one computer, wherein the at least one computer is operative to cause output of the first and second user interfaces responsive to the at least one first document.

As discussed previously with respect to claim 18, Clark does not disclose or suggest an automated banking machine that is operative to cause output of user interfaces responsive to both

a document and determined types of input devices. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 4 is further allowable on this basis.

Claim 9

Amended claim 9 depends from claim 1 and recites that for each user station, the corresponding user interface includes at least one user interface element that is adapted, responsive to the determined at least one capability, for user interaction through the at least one input device included in the user station.

Clark does not disclose or suggest a user interface element output through a display device at a user station which is adapted, responsive to determined capabilities of input devices, for user interaction through an input device included in the user station. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 9 is further allowable on this basis.

Claim 10

Claim 10 depends from claim 8 and recites that the apparatus further comprises a document in operative connection with the computer. The document includes a plurality of command instructions. The at least one software application is operative to output the user interface for each user station, responsive to the command instructions.

As discussed previously, Clark does not disclose or suggest a document that includes a plurality of command instructions. Further, Clark does not disclose or suggest a software

application that is operative to output a user interface for each user station, responsive to the command instructions.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 10 is further allowable on this basis.

Claim 19

Claim 19 depends from claim 18 and recites that the method further comprises: d) determining at least one second type associated with a second input device on the machine, wherein the second input device is associated with a second display device on the machine; and e) presenting at least one second user interface through the second display device, responsive to the determined at least one second type and the at least one first document.

Clark does not disclose or suggest determining both a first type and a second type associated with first and second input devices respectively on an automated banking machine. Further, Clark does not disclose or suggest presenting first and second user interfaces through first and second display devices respectively responsive to the determined first and second types of input devices and at least one first document.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 19 is further allowable on this basis.

Claim 20

Claim 20 depends from claim 19 and recites that the method further comprises: f) performing a first function responsive to the at least one first document and a first input through

the first input device; and g) performing the first function responsive to the at least one first document and a second input through the second input device.

Clark does not disclose performing a function responsive to a document. Further Clark does not disclose or suggest performing the function responsive to the document and a first input through a first input device associated with a first display device of the machine and performing the function responsive to the document and a second input through a second input device associated with a second display device of the machine.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 20 is further allowable on this basis.

Claim 21

Claim 21 depends from claim 20 and recites that the method further comprises that in each of steps (f) and (g), performing the first function includes dispensing cash from the machine.

Clark does not disclose or suggest dispensing cash responsive to a document and a first input through a first input device associated with a first display device of the machine and dispensing cash responsive to the document and a second input through a second input device associated with a second display device of the machine.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 21 is further allowable on this basis.

Claim 22

Claim 22 depends from claim 20 and recites that in each of steps (f) and (g), performing the first function includes performing a maintenance related operation with the machine.

Clark does not disclose or suggest performing a maintenance related operation with the automated banking machine responsive to a document and a first input through a first input device associated with a first display device of the machine and performing the maintenance related operation with the machine responsive to the document and a second input through a second input device associated with a second display device of the machine.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 22 is further allowable on this basis.

Claim 23

Claim 23 depends from claim 20 and recites that in each of steps (f) and (g), performing the first function includes invoking at least one event processor specified by the first document.

Clark does not disclose or suggest invoking at least one event processor specified by a first document responsive to a first input through a first input device associated with a first display device of the machine and invoking the at least one event processor specified by the first document responsive to a second input through a second input device associated with a second display device of the machine.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 23 is further allowable on this basis.

**The Pending Claims Are Not Obvious Over
Clark in view of Butler**

In the Action claims 2 and 3 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Clark in view of Butler. These rejections are respectfully traversed. Applicants response to these rejections is based on the Office's referenced interpretations of Clark and Butler. Thus, any change in the Office's interpretation of these references shall constitute a new ground of rejection.

Applicants traverse these rejections on the grounds that Applicants' claims recite features and relationships which are neither disclosed nor suggested in the prior art, and because there is no teaching, suggestion or motivation cited so as to produce Applicants' invention. The features recited in Applicants' claims patentably distinguish over the applied references.

Claim 2

Amended claim 2 depends from claim 1 and recites that the at least one computer is operative to cause a desktop environment to be generated, wherein the desktop environment spans the first and second display devices.

Nowhere in either Clark or Butler is there a teaching, suggestion, or motivation to create a single desktop environment in an automated banking machine which spans two displays of an automated banking machine.

The Action asserts that it would have obvious to one of ordinary skill in the art at the time the invention was made to incorporate the teaching of Butler to the teachings of Clark in order to provide an intelligent and efficient means wherein the boundaries of spanned Windows are re-

drawn by moving a block of bits from one portion to another of the frame buffer for that monitor. The Action further asserts that such a modification would provide an improved and an enhanced means for reducing the number of necessary pixel calculations while maintaining the color characteristics of the various monitors being used, and therefore an obvious expedient. Applicants disagree.

The ATM of Clark includes a first display device (20) at a user panel (12) (Figure 1) and a second display device (28) at an operator panel (26) within the ATM. However, nowhere in Clark is there a suggestion or motivation to provide two display devices of an ATM with features such as: "spanned Windows" or "maintaining color characteristics of various monitors".

Butler at best may arguably teach that it is useful to span a desktop across multiple adjacent display devices (Figure 4) to enable a user to view large display regions (e.g. an editing window and an output window) at substantially the same time (Column 1, lines 45-58).

However, Clark does not disclose or suggest that its user panel display and operator panel display are adjacent or otherwise viewable at the same time. The user panel of Clark is located outside at the front of the machine, while the operator panel of Clark is located inside the machine. Thus the reasons indicated in Butler for spanning a desktop across two adjacent displays would not apply to an ATM in which two display devices are not adjacent or otherwise viewable at the same time.

Thus there is no teaching, suggestion, or motivation in Clark or Butler to combine the two references so as to produce an automated banking machine apparatus with a desktop environment that spans the first and second display devices of the machine. As nothing in the applied art

discloses or suggests these features, it is respectfully submitted that claim 2 is further allowable on this basis.

Claim 3

Claim 3 depends from claim 2 and recites that the at least one computer is operative responsive to the at least one software application to cause the first user interface to be produced in a first portion of the desktop environment that is being output through the first display device, and to cause the second user interface to be produced in a second portion of the desktop environment that is being output through the second display device.

Neither Clark not Butler disclose or suggest an automated banking machine that includes a software application that is operative to cause a first user interface to be produced in a first portion of a desktop environment that is being output through a first display device of machine, and to cause the second user interface to be produced in a second portion of the desktop environment that is being output through the second display device of the machine.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 3 is further allowable on this basis.

The Pending Claims Are Not Obvious Over Clark in view of Coutts

In the Action claims 5-7, 11-17, 24, and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Clark in view of Coutts. These rejections are respectfully traversed. Applicants response to these rejections is based on the Office's referenced interpretations of

Clark and Coutts. Thus, any change in the Office's interpretation of these references shall constitute a new ground of rejection.

Applicants traverse these rejections on the grounds that Applicants' claims recite features and relationships which are neither disclosed nor suggested in the prior art, and because there is no teaching, suggestion or motivation cited so as to produce Applicants' invention. The features recited in Applicants' claims patentably distinguish over the applied references.

Claim 5

Claim 5 depends from claim 4 and recites that the at least one first document includes a plurality of command instructions that correspond to hardware independent user interface elements. Claim 5 depends from claim 4 which recites that the apparatus comprises at least one document. Further claim 4 depends from claim 1 and recites that the apparatus also comprises at least one software application.

The Action asserts that Coutts teaches an ATM that is operated using a software/program created with the JAVA program language. The Action further asserts that the JAVA program language is hardware independent type program language.

However, nowhere does the Action indicate where Clark or Coutts teaches an automated banking with both a software application and a document. In addition, claim 5 recites that the first document includes a plurality of command instructions that correspond to hardware independent user interface elements. Thus regardless of whether a software application written in JAVA can be considered to be hardware independent, the Action does not indicate where

Clark or Coutts teach or suggest a document with command instructions that correspond to hardware independent user interface elements.

Thus the Action has failed to show that Clark and/or Coutts disclose or suggest that an automated banking machine include both a software application and a document, which document includes command instructions corresponding to hardware independent user interface elements.

As discussed previously, before a claim may be rejected on the basis of obviousness pursuant to 35 U.S.C. § 103, the Patent Office bears the burden of establishing that all the recited features of the claim are known in the prior art. This is known as *prima facie* obviousness. To establish *prima facie* obviousness, it must be shown that all the elements and relationships recited in the claim are known in the prior art. If the Office does not produce a *prima facie* case, then the Applicants are under no obligation to submit evidence of nonobviousness. MPEP § 2142.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 5 is further allowable on this basis.

Claim 6

Amended claim 6 depends from claim 5 and recites that the at least one software application includes at least one event processor, wherein the command instructions are operative to specify an event processor, wherein the at least one computer is operative to invoke an event processor responsive to at least one of the command instructions and responsive to an input from either the at least one first input device or the at least one second input device.

Neither Clark nor Coutts discloses or suggests a document with command instructions which are operative to specify an event processor included in a software application. In addition neither reference discloses or suggests a computer in the machine which invokes the event processor responsive to both the command instructions in the document and an input from either a first input device associated with a first display or a second input device associated with a second display.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 6 is further allowable on this basis.

Claim 7

Claim 7 depends from claim 6 and recites that the at least one computer is operative responsive to the event processor to cause the machine to perform at least one maintenance related function. Neither Clark nor Coutts discloses or suggests a computer which is responsive to an input from either a first input device associated with first display or a second input device associated with a second display to invoke an event processor which causes an automated banking machine to perform a maintenance related function.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 7 is further allowable on this basis.

Claim 11

Amended claim 11 depends from claim 10 and recites that an input device included in a first of the user stations includes a pointing device. Claim 11 also recites that an input device

included in a second of the user stations includes at least one key. The at least one software application, responsive to a first command instruction in the document and a determined capability of the pointing device, is operative to generate a first user interface element in the first user interface that is adapted for selection with the pointing device. In addition the at least one software application, responsive to the first command instruction and a determined capability of the at least one key, is operative to generate a second user interface element in the second user interface that is adapted for selection with the at least one key.

Neither Clark nor Coutts discloses or suggests a software application in an automated banking machine that is responsive to a first command instruction in a document and a determined capability of a pointing device to generate a user interface element that is adapted for selection using the pointing device. Further neither reference discloses or suggest that such a software application that is further responsive to the first command instruction in the document and a determined capability of at least one key to generate a user interface element that is adapted for selection using the at least one key.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 11 is further allowable on this basis.

Claim 12

Amended claim 12 depends from claim 11 and recites that the apparatus further comprises at least one event processor software component in operative connection with the computer. The at least one software application is operatively responsive to the first command instruction and either selection of the first user interface element with at least one first input from

the pointing device or a selection of the second user interface element with at least one second input from the at least one key, to invoke a common function of the event processor component.

Neither Clark nor Coutts discloses or suggests a software application in an automated banking machine that invokes a common function of an event processor responsive to a first command instruction in a document and either a selection of a first user interface element with an input from a pointing device of a first user station or selection of a second user interface element with an input from a key of a second user station.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 12 is further allowable on this basis.

Claim 13

Claim 13 depends from claim 12 and recites that the apparatus further comprises at least one transaction function device in operative connection with the computer. The event processor component is operative to cause the at least one transaction function device to perform an operation responsive to either the first input or the second input.

Neither Clark nor Coutts discloses or suggests an event processor that causes a transaction function device of an automated banking machine to perform an operation responsive to either a first input from a pointer device at a first user station or a second input from a key at a second user station.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 13 is further allowable on this basis.

Claim 14

Amended claim 14 depends from claim 11 and recites that the computer is operative responsive to the first command instruction and either a selection of the first user interface element with at least one first input from the pointing device or a selection of the second user interface element with at least one second input from the at least one key, to have the machine perform a common maintenance operation.

Neither Clark nor Coutts discloses or suggests a computer that has an automated banking machine perform a common maintenance operation responsive to a first command instruction in a document and either a selection of a first user interface element with at least one first input from a pointing device of a first user station or a selection of a second user interface element with at least one second input from at least one key of a second user station.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 14 is further allowable on this basis.

Claim 15

Claim 15 depends from claim 10 and recites that the apparatus further comprises at least one second document that is associated with the first document. The first document includes a first command instruction and a second command instruction. The second document includes a third command instruction that corresponds to the first command instruction. In addition, the first command instruction includes a first label in a first human language. The third command instruction includes a second label in a second human language that has a meaning corresponding to the first label. Claim 15 also recites that the at least one software application is operative to

output each user interface with indicia in the second human language responsive to both the first and second documents.

Neither Clark nor Coutts discloses or suggests an automated banking machine includes a first command instruction in a first document with a first label in a first human language, and a third command instruction in a second document with a second label in a second human language that has a meaning corresponding to the first label. Further neither reference discloses or suggests the third command instruction in the second document corresponds to the first command instruction in the first document. In addition neither reference discloses or suggests a software application in an automated banking machine which is operative to output user interfaces at a first and a second user station with indicia in the second human language responsive to both the first and second documents.

As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 15 is further allowable on this basis.

Claim 16

Claim 16 depends from claim 15 and recites that the at least one software application is operative to generate each user interface with user interface elements that correspond to the second and third command instructions.

Neither Clark nor Coutts discloses or suggests a software application in an automated banking machine which generates user interfaces at each user station with user interface elements that correspond to the second and third command instructions. As nothing in the applied art

discloses or suggests these features, it is respectfully submitted that claim 16 is further allowable on this basis.

Claim 17

Claim 17 depends from claim 16, and recites that the at least one software application is operative to generate each user interface responsive to the second label being substituted for the first label.

Neither Clark nor Coutts discloses or suggests a software application in an automated banking machine which generates user interfaces responsive to a second label in a second human language being substituted for a first label in a first human language. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 17 is further allowable on this basis.

Claim 24

Claim 24 has been rewritten into independent form. The scope of the subject matter recited in claim 24 remains unchanged. Claim 24 is directed to a method which comprises the steps recited in claim 18. It is respectfully submitted that claim 24 is allowable for at least the same reasons discussed previously with respect to claim 18. In addition claim 24 recites in the presenting step that in addition to the least one first user interface being presented through the first display device responsive to the determined at least one first type and the at least one first document, the at least one first user interface is also presented through the first display device

responsive to at least one second document. The at least one second document includes at least one language translation of indicia included in the first document.

Neither Clark nor Coutts disclose or suggest presenting at least one first user interface through a first display device, responsive to a determined at least one first type of an input device, at least one first document, and the at least one second document. Further neither reference discloses at least one second document that includes at least one language translation of indicia included in the first document.

As nothing in the cited art discloses or suggests the features and relationships that are specifically recited in the claim, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Applicants' invention, it is respectfully submitted that the claim is allowable for these reasons. Therefore, it is respectfully submitted that the 35 U.S.C. § 103(a) rejection should be withdrawn. It follows that claims 25 which depends from claim 24 is likewise allowable.

Claim 25

Claim 25 depends from claim 24 and recites that the method further comprises: h) substituting for a first command instruction in the at least one first document, a second corresponding command instruction in the at least one second document. The first command instruction includes a first label in a first human language and wherein the second command instruction includes a second label in a dialect of the first human language.

Neither Clark nor Coutts disclose or suggest substituting for a first command instruction in the at least one first document, a second corresponding command instruction in the at least one

second document. Further neither reference discloses or suggests that a first command instruction includes a first label in a first human language and a second command instruction includes a second label in a dialect of the first human language. As nothing in the applied art discloses or suggests these features, it is respectfully submitted that claim 25 is further allowable on this basis.

The New Claims

New claims 27-40 have been added. None of the cited references alone or in combination discloses or suggests the features and relationships that are specifically recited in the new claims 27-40. These claims recite features, relationships and steps recited in the original claims and are allowable for at least the same reasons. As nothing in the cited art discloses nor suggests the features and relationships that are specifically recited in the new claims, and because there is no teaching, suggestion or motivation cited for combining features of the cited references so as to produce Applicants' invention, it is respectfully submitted that the new claims are allowable for these reasons.

Additional Comments

Applicants request acknowledgment of their claim for domestic priority. This application claims benefit of U.S. Provisional Application Serial No. 60/223,157 filed August 7, 2000 and is a continuation-in-part of copending U.S. Application Serial No. 09/233,249 filed on January 19, 1999. The nonprovisional application designated above, namely application 09/233,249 filed

January 19, 1999 claims the benefit of U.S. Provisional Application Serial No. 60/105,800 filed October 27, 1998.

Additional Claim Fees

Please charge the fees associated with prosecution of three additional independent claims in excess of 3 (\$252) and thirteen additional total claims (\$234) and any other fee due, to Deposit Account No. 09-0428 of InterBold.

Conclusion

Each of Applicants' pending claims specifically recites features and relationships that are neither disclosed nor suggested in any of the applied art. Furthermore, the applied art is devoid of any such teaching, suggestion, or motivation for combining features of the applied art so as to produce Applicants' invention. Allowance of all of Applicants' pending claims is therefore respectfully requested.

The undersigned will be happy to discuss any aspect of the Application by telephone at the Examiner's convenience.

Respectfully submitted,



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